

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF CONNECTICUT

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385  
10-11

001704 549949

UNITED STATES OF AMERICA,  
Plaintiff,

-vs-

SOLVENTS RECOVERY SERVICE OF  
NEW ENGLAND AND LORI ENGINEERING  
COMPANY,  
Defendent

: Civil Action No. H-79-704

: AFFIDAVIT

I, Julie A. Klaas, first being duly sworn, depose and say as follows:


1. Since March, 1981, I have been employed in the Washington, D.C. (headquarters) office of the United States Environmental Protection Agency as a Management Analyst in the Office of Waste Programs Enforcement (Superfund), Office of Solid Waste and Emergency Response. My duties in this position are to provide primary support for all procurement and contract actions, and to keep an accounting of all funds obligated and spent.

2. In this capacity, I performed work on the case of U.S.E.P.A. vs. Solvents Recovery Service of New England. My work on this case has included obtaining an expert witness for data review, negotiations and trial.

3. The attached document detail the costs incurred and task description for work under contract with Life Systems, Inc. for the services of Dr. Curtis Klaassen as an expert toxicological consultant for the government on the Solvents Recovery case.

4. The total expenses to the government for the work described in item 3 above was \$14,516.81 as of Sept. 30, 1982. If all planned activities are required and completed as outlined in our work assignment for Dr. Klaassen, \$7,109 additional expenses will be incurred.

Further, Affiant sayeth not.

  
Julie A. Klaas  
Management Analyst

Subscribed and sworn to before me  
this 21 day of October, 1982

  
Notary Public

My commission expires on \_\_\_\_\_ My Commission Expires March 14, 1987



SDMS DocID

549949

DISTRICT OF COLUMBIA

*Life Systems, Inc.*

24755 HIGHPOINT ROAD CLEVELAND, OHIO 44122 PHONE: 216 464-3291

October 19, 1982  
RHR-10-20

Ms. Julie Klaas  
Office of Waste Programs  
Enforcement - Tele. No. 202-382-4842  
(WH-527) Room No. S-364-N  
U.S. Environmental Protection Agency  
401 M Street, SW  
Washington, DC 20460

Dear Ms. Klaas:

As per your telephone request, to enable the Government to recover actual costs for litigation support the following information is provided on the efforts by Life Systems, Inc. through September 30, 1982 that have been invoiced (actually billed) on Civil Action No. H-79-704 (Litigation Actions Against Solvents Recovery Service of New England).

These efforts included the following:

- 1) Preparation of two Work Assignment Plans (efforts performed under two separate contractual mechanisms).
- 2) Identification, evaluation and selection of three expert witness nominees from which one individual was selected by EPA/DOJ.
- 3) Perform an automated and manual information search and acquire the relevant technical references.
- 4) Provide detailed instructions to the expert witness.
- 5) Prepare the following technical documents:
  - a. Evaluation of Analytical Data and Health Endangerment Report
  - b. Affidavit Summarizing Adverse Health Endangerment
  - c. Revised Health Endangerment Report
- 6) Provide six monthly technical progress reports and inputs to monthly contract financial reports.
- 7) Provide planning and management of the effort.

continued -

Julie Klass

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October 19, 1982

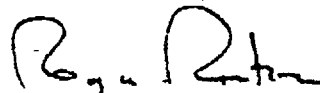
The total invoiced amount through September 30, 1982 is \$14,516.81. A summary of these costs is as follows:

	<u>Hours</u>	<u>Cost</u>
Total Direct Materials	--	-0-
Total Direct Labor Cost	293.0	3,954.72
Total Other Direct Costs	--	2,367.25
Total Estimated Cost and Fee	--	\$14,516.81

The estimated cost to complete all remaining efforts spelled out in the Work Assignment Plan (TR-506-31) and pay the committed but yet unbilled expenses is approximately \$7,109 additional. This cost would be incurred if all planned activities are required and completed.

Very truly yours,

LIFE SYSTEMS, INC.



R. H. Reuter, Ph.D.  
Contract Administrator

RHR/cdr

cc: ICAIR Program Manager  
ICAIR Task Manager